

EXHIBIT 1

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 In Pro Se

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 David W. Slayton,
 Executive Officer/Clerk of Court,
 By R. Perez, Deputy Clerk

SUPERIOR COURT OF THE STATE OF CALIFORNIA
 COUNTY OF LOS ANGELES

)	Case No: 23ST CV 26788
Plaintiff,)	DOCUMENT NAME (COMPLAINT
Muhammad Umair Nabeel)	OF INTELLECTUAL PROPERTY)
Vs)	
)	
Defendant(s):)	
TAYLOR SWIFT PRODUCTIONS, INC)	

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Introduction

1. This is an action being brought up by Muhammad Umair Nabeel against the defendant TAYLOR SWIFT PRODUCTIONS, INC.. TAYLOR SWIFT PRODUCTIONS, INC. is a production company of singer Taylor Swift.
2. In the plaintiff's mid-teens, he had the opportunity to meet Selena Gomez, a friend of Taylor Swift. After this encounter, Selena Gomez, along with her team and associates, initiated a practice involving the creation and sale of video songs that featured a likeness resembling the plaintiff, all without his knowledge or consent.
3. The songs became a place where Selena Gomez and her friend singers provided identifiable information about the plaintiff, and appropriated the likeness of the plaintiff.
4. This is a willful action being brought up against TAYLOR SWIFT PRODUCTIONS, INC, under the California Civil Code 3344, common law Right of Publicity, False Light, and Public Disclosure of Private Facts.
5. This case is being brought up by Muhammad Umair Nabeel, a Pakistani citizen who was an international student in the United States.
6. TAYLOR SWIFT PRODUCTIONS, INC, used various elements of the Plaintiff by incorporating them into her video for "Look What You Made Me Do".

Jurisdiction

7. The court has personal jurisdiction over the defendants because the defendants have directed their activities and marketing of infringing works to California Residents, and California residents are able to purchase, download, and stream the infringing composition and recordings.

1 8. Defendants have engaged in systematic and continuous business activities relating to the
2 infringing works. As such, the Defendants have engaged in continuing business activities in the
3 instant jurisdiction.

4 9. The Defendants are, at a minimum, constructively aware of their continuous and substantial
5 commercial interactions with the California Residents.

6 10. Defendants have performed, and the defendants have authorized, organized, and promoted
7 performances of infringing work numerous times in California.

8 11. The Defendants have generated touring and recording revenues from the unauthorized and
9 unlawful exploitation of the infringing work, including receiving substantial revenue from such
10 exploitation in California. They have advertised the Infringing works to California residents.

11 12. The Defendants, individually and collectively, have generated substantial revenue from the
12 exploitation of the infringing works in California.

13 13. California has a considerable interest in adjudication disputes wherein California residents
14 are the target of harm resulting from the exploitation of the infringing work.

15 14. Although some of the defendants are primarily based abroad, they facilitated the infringing
16 acts occurring in California and actively participated in scheme aiding, inducing, and contributing to
17 infringement in California.
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Parties

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21 15. Plaintiff MUHAMMAD UMAIR NABEEL is an individual in his 20s.

22 16. Defendant TAYLOR SWIFT PRODUCTIONS, INC, is a production company of singer Taylor
23 Swift.
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Statute of Limitations

25 17. When the first song was released that used the likeness of the plaintiff, he was still a minor.
26 As songs featuring his information continued to be released, the plaintiff's mental health started
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1 deteriorating, leading to multiple hospitalizations in the years 2017, 2018, 2020, 2021, 2022, and
2 2023.

3 18. The infringing video Look What You Made Me Do was released in 2017 by the defendant.
4 Before and after the release of videos the plaintiff was admitted to mental institutions. This ongoing
5 mental health struggle has prevented the plaintiff from becoming a productive member of society.

6 19. The plaintiff also had to move countries multiple times due to various reasons. The video was
7 published when he was out of the United States.

8 20. In 2017 there was an explosion in the plaintiffs apartment. The mother of the plaintiff
9 suffered severe burns on her body and she lost a lot of skin. Though the explosion missed the
10 plaintiff, the following years were filled with fear. This coupled with the mental illness of the plaintiff
11 prevented the plaintiff from becoming a productive member of society.

12 a. The mental illness was exacerbated by the video songs about the plaintiff's accident like
13 Look What You Made Me Do. The plaintiff's hospital stays would get elongated as he believed that
14 the people could hear his thoughts. The songs were his proof.

15 b. The video for the song Ready For It? by Taylor Swift contained the message "They are
16 burning all the witches". The video was released after the explosion at the plaintiff's apartment. This
17 made the plaintiff fear for his safety.
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20 Background

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22 21. In 2012, the Plaintiff, Muhammad Umair Nabeel, met the singer and CEO of JULY MOON
23 PRODUCTIONS, INC. Selena Gomez in New York City. Ms. Gomez subsequently released a song
24 that incorporated elements of Nabeel's Pakistani culture without his input or consent. She used a
25 Pakistani background singer, showcased Pakistani instruments and musicians, and included a
26 falcon in the video. The lyrics of the song stated "When you are ready for it, come and get it" with a
27 background singer singing in Urdu (ethnic language of Pakistanis). At the time, Nabeel was a minor,
28

1 while Ms. Gomez was 19 to 20. They never discussed making a song together. Mr. Nabeel received
2 no compensation or contact from the defendant or their studio.

3 22. After Ms. Selena Gomez released a song that used the likeness of the Plaintiff in 2013, she
4 and her friends (Ms. Taylor Swift and others) made a genre of music centered around the Plaintiff's
5 personal life. This marked an addition in their approach, as they previously created songs that
6 admired their boyfriends, but now they were also making songs that contained the likeness of the
7 Plaintiff.

8 23. Appropriation of the plaintiff caused a huge strain on the plaintiff's health, privacy, and his
9 and his family's well-being. His identifiable information was being released on big screens for the
10 public to dance on.

11 24. The songs about the plaintiff are different from the songs of Taylor Swift about her
12 boyfriends. In her songs about her boyfriends, she expresses the connection she has with them.
13 Good examples are the song Style and Picture to burn (both by Taylor Swift), where she sings about
14 how the boyfriend and her are never out of public grace and how she dislikes that her boyfriend
15 never lets her drive his truck. The plaintiff has never had a meeting with the singer Taylor Swift. In
16 the song Look What You Made Me Do, she sings revealing information about the plaintiff's private
17 facts and information.
18

19 20 Likeness of character

21 22 Likeness in the video song Look What You Made Me Do

23
24 25. The plaintiff was an international student inside the United States. The plaintiff wasn't sent by
25 ultra rich Middle Eastern parents, but he was sent by his elder brothers. The plaintiff was able to
26 convince his brothers to pay for his college by his reputation. He was good at studies, extrovert, won
27 lots of contests, solo traveled to India as a Pakistani, traveled to Europe, and other places to show
28 dependability.

1 26. After moving to the United States in 2013, the plaintiff kept the reputation intact and improved
2 his persona. He got to losing weight, graduated with an A.A. degree and transferred to University of
3 Central Florida for Chemistry and Electrical Engineering at the University. He enrolled as a junior.
4 He had high ambitions, he wanted to do Masters in Biomedical science and then become a
5 prosthetics engineer. The plaintiff also got married, which meant that the plaintiff was also keeping
6 his religious values intact (in Islam it is considered picious to marry early).

7 27. In March 2017 (2nd semester at the University) the plaintiff got into a car crash. The plaintiff
8 was subsequently arrested. The lawyers were expensive, and the plaintiff had to drop out of the
9 University. The plaintiff's reputation was ruined.

10 28. In August 2017 Taylor Swift came out with an album called Reputation. In the first video song
11 that was released by her, she appropriates the whole ordeal.

12 29. Defendant Taylor Swift Productions Inc. used Plaintiff Muhammad Umair Nabeel's likeness in
13 their video song Look What You Made Me Do for commercial purposes.

14 a. Look What You Made Me Do copies the likeness of the plaintiff.

15 The video gives a number of identifiable references by appropriating the likeness of the
16 plaintiff. The car color, the crash of the plaintiff, his arrest records, how he had to spend a lot on
17 lawyers. Bikes the plaintiff rode, his choice of pets, his university status and how he dropped out of
18 University, his name initials, and also referenced his mental illness. The song also showed the
19 plaintiff in false light. The song falsely showed that the married plaintiff was with sex workers.

20 i. Look What You Made Me Do is one of 5 video songs that were released after the plaintiff's
21 accident. The other 3 songs are by Selena Gomez (a friend of Taylor Swift). They all appropriate the
22 plaintiff's accident.

23 30. It is like:

24 a. A personality gets married, and a different event management company that the personality
25 has never even met uses the personality's initials, design of the wedding dress, the illness that the
26

1 partners share with one another, and the ceremony itself to promote their event management
2 company's exclusive Fall Season package.

3 b. In this case, the defendant used an unfortunate event of the plaintiff, in which he lost
4 reputation, to promote her album called Reputation.

5 c. In *White v. Samsung Electronics America, Inc.*, 971 F.2d 1395 (9th Cir. 1992),
6 the defendant appropriated the likeness of the plaintiff White without consent.

7 It was said in the process of the case that "Saddam Hussein wants to keep advertisers from
8 using his picture in unflattering contexts. Clint Eastwood doesn't want tabloids to write about him.
9 Rudolf Valentino's heirs want to control his film biography. The Girl Scouts don't want their image
10 soiled by association with certain activities."

11
12 iii. Similarly the plaintiff wants to protect his persona. The plaintiff does not want to be depicted
13 with 100s of sex workers and in false light be shown with a high number of sexual partners,
14 something that was portrayed in the video.

15 Facts

16
17 31. The reference points:

18 a. The plaintiff drove a gold color car. In the video the protagonist is shown driving a gold car.

19 b. The plaintiff had a crash in a gold car. The protagonist is shown having a crash in a gold car.

20 c. After the accident, the plaintiff was arrested. The protagonist is shown in a jail cell, eating
21 lobsters (food for prisoners in the past) after the accident.

22 d. The plaintiff had to spend semesters worth of money on lawyers. The protagonist is shown
23 burning through the cash.

24 e. The plaintiff rode Harley Davidsons, occasionally tried different Harley Davidson motorcycles,
25 the plaintiff's ex-wife (wife at the time) also worked at a restaurant in a Harley Davidson dealership.
26 The protagonist is shown with Harley Davidson motorcycles.
27
28

1 f. The plaintiff who met Selena Gomez as a minor, had signed souvenirs from her, dropped out
2 of University at the junior standing. The protagonist is shown dropping while wearing a junior t-shirt
3 with an autograph from Selena Gomez.

4 g. The plaintiff had a pet cat. The plaintiff's name is Muhammad Umair Nabeel. He goes by the
5 name Umair. Initial U. The protagonist is shown giving a speech with "U squad" displayed in the
6 back. In the same scene, the protagonist is shown giving a speech with a cat animation.

7 h. The plaintiff was placed in a mental institution inside the United States and in Pakistan. The
8 video shows the protagonist with mental illness.

9
10 32. The video song gives multiple reference points, then shows the plaintiff in false light.

11 a. The video falsely shows the plaintiff with Bondage sex workers.

12 b. It depicts the married plaintiff with multiple sex partners.

13 c. It also shows the plaintiff with cross dressers.

14 33. The album is about losing reputation, something that had happened to the plaintiff.

15 a. In the song Look What You Made Me Do, the singer says that she doesn't trust anybody and
16 nobody trusts her.

17 b. In the song Delicate, the singer says her reputation's never been worse.

18
19 Commercial gain and advantage

20
21 34. The music videos attract attention to the music albums and exclusive merchandise like T-
22 Shirts, other clothes, mugs, etc. The videos are a big part of branding the album and its
23 merchandise. The music videos also make revenue for the defendant.

24 35. The Plaintiff was a student. The personality of the plaintiff resonated with the students.
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26
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The plaintiff's Personality

36. The plaintiff was a top of the class student, he won a lot of competitions, including educational competitions like Microsoft Hackathon, and was a solo traveler since the age of 13.

37. The plaintiff is an artist. The Plaintiff was in University of Central Florida. He previously graduated from Valencia College in Orlando, Florida and Manarat Al Riyadh International School in Riyadh, Saudi Arabia. The plaintiff was well known in school, college ,and University.

38. The plaintiff was in an advertisement commercial. The advertisement included singer Selena Gomez. He was one of the first people who came from Saudi Arabia and met an American Singer publicly (in front of the Saudi audience).

39. The plaintiff had a short film studio and ran it on Facebook.com. The plaintiff had a facebook page with over 100 thousand Facebook likes. The plaintiff also had an instagram where he uploaded periodically. Moreover, the plaintiff is also someone who painted, he had received recognition from the Ministry of Education in Saudi Arabia for his painting. The plaintiff is an artist of many talents.

Absence of consent

40. The Plaintiff Muhammad Umair Nabeel did not consent to the use.

a. He only met a public friend of Taylor Swift in 2012 called Selena Gomez. The meeting was arranged by a beauty product company as part of their promotion. The plaintiff was a minor and had won a contest on their brand Facebook Page.

b. He never signed a contract, nor a release form with Taylor Swift or her record label Big Machine Label Group Inc.

Harm

Involuntary Servitude

41. OJ Simpson is a famous American Football player who was acquitted of his criminal charge of murdering his wife and her friend. He had to give up his intellectual property rights after he was held liable in a wrongful death civil lawsuit. When the opposing family filed a motion to transfer Simpson's publicity rights, the Judge likened such an alienation of his right of publicity to forcing Simpson into "involuntary servitude".

42. The plaintiff suffers from over a decade of use of his likeness by the likes of TAYLOR SWIFT PRODUCTIONS, INC. and friends. The plaintiff didn't consent to the use of his likeness and it doesn't seem to be revocable (there is no opt-out button).

43. Some of the artists who used the likeness of the plaintiff in their videos are Selena Gomez, Taylor Swift, Lady Gaga, Katy Perry, the ex boyfriend of Selena Gomez known as The Weeknd and many more. They used the likeness of the plaintiff without his permission and they have been doing so for over a decade.

44. As an international student, the plaintiff was not allowed to work, sell pieces of paintings and pictures, and required special permission for free volunteer work at the nonprofits. This is put in place by the Government of the United States to stop the exploitation of international students who are guests in the country. If the defendant were to approach the plaintiff, he first would have needed permission from his international student advisor, then he would have been in a position to approve or deny. Most of the time, students do not get permission to work as they need a special reason to get the approval, a reason like the parent being unable to financially support due to illness.

45. Having his likeness used in videos of Selena Gomez and her celebrity friends (Taylor Swift) is work. The plaintiff has a constant feeling that he is always on a show as his persona is being used by the music industry. If he was being monetarily compensated for the persona, then he would have

1 improved his persona. Something that would have helped him sell his persona for even more money
2 (business). However, the defendant never approached the plaintiff and this was illegal for the plaintiff
3 to do as that would mean working.

4 46. Previously, college athletes were not allowed to make money from their personality. This
5 changed after the NCAA allowed it. International students who are college athletes are still not
6 allowed to get compensation for their image, name, and likeness. The sale/licensing of image,
7 name, and likeness is considered work and the international students are not allowed to work. Using
8 the likeness of the plaintiff is making him work. Something that the defendant did and is illegal.

9
10 47. Being on an F1 visa and having work restrictions does not deprive the plaintiff of his legal
11 rights. Even if the plaintiff couldn't legally earn money at the time, that doesn't necessarily mean
12 someone else can profit off his name, image or likeness without his consent.

13 Commercialization

14
15 48. The plaintiff had a car crash in March 2017. The Defendant and their associated singers
16 produced multiple videos about his car crash, hospitalization, and marital life of the plaintiff after the
17 crash. After the plaintiff had an accident he was injured, hurt, and mentally tormented by the
18 accident. It wasn't the time to sell the tragic story. The plaintiff was worried about losing his home in
19 the United States. He was also worried about losing his wife, his pets, and his education pursuits.
20 The defendant commercializing the tragedy didn't care and didn't ask for consent and as seen in the
21 song, they were well aware of his mental illness, and made songs about the plaintiff.
22

23 Loss of value

24
25 49. In *Zacchini v. Scripps-Howard Broadcasting Co.*, 433 U.S. 562 (1977), Justice White, when
26 reversing the Ohio Supreme Court, explained that the right of publicity functions to compensate
27 entertainers "for time and effort" dedicated to performing and "provides an economic incentive" to
28 create future creative acts.

50. The plaintiff wants to get paid for his persona as per his business decision. Musicians pay each other for sampling the music, interpolation of the music, and covering each other's songs. Asking permission for the plaintiff's likeness, paying the plaintiff for his likeness is something that the defendant should have done.

51. The appropriation by the defendant lost the commercial value from the plaintiff. The plaintiff was not able to control his persona. The defendant falsely showed the depiction of the plaintiff with sex workers.

Mental Illness

pov: u were too honest with ur therapist



52. In mental health therapy, clinicians advise patients that there is no one pursuing them. Their aim is to soothe the patient's anxiety and remove any paranoia. However, in the Plaintiff's situation, the video of Look What You Made Me Do made the healing process difficult.

a. The information revealing song really took a toll on the plaintiff's self image. The plaintiff couldn't recover from depression, it took more than a few years to correct.

b. The therapists recommend staying true to Islamic values, the songs were not letting the plaintiff be true to his values.

1 c. The plaintiff believed that the others could listen to his thoughts. The videos solidified the
2 belief. It is something that got him high potency tablets of schizophrenia, the doctors made him
3 spend a long time in rehab centers everytime he was in, and it resulted in distress to the plaintiff and
4 his family. This also meant that the bill of rehab and medication was high.

5 d. The paranoia of Plaintiff couldn't calm down due to the video.

6 53. While the plaintiff was suffering from mental illness, they sang more songs, and the songs
7 were about his mental illness.

8 54. The plaintiff's mental illness necessitated frequent and multiple hospitalizations over the
9 course of several years, constant medication, and psychotherapy.

10 55. The plaintiff now takes 4 pills twice a day (8 pills a day). The medications are expensive,
11 have side effects, and are permanent. His disorder is classified as a disability. It makes it difficult for
12 him to learn, work, and even enjoy everyday moments.
13

14
15 Public disclosure of private facts.

16 56. In *Shulman v. Group W Productions*, 18 Cal.4th 200, 955 P.2d 469, 74 Cal.Rptr.2d 843 (Cal.
17 1998), the conversations with the health practitioner were deemed to be private, offensive and
18 objectionable to a reasonable person if revealed, and not of legitimate public concern.

19 57. The actions of the defendant are highly offensive. Revealing that a mental illness patient is
20 having trust issues with his family, revealing tons of referenceable information of a mental illness
21 patient wouldn't sit right with a reasonable person. More importantly, revealing that the defendant
22 has mental illness is not reasonable. TAYLOR SWIFT PRODUCTIONS, INC., publicizes without
23 consent.
24

25 58. The defendant publicizes the private facts of the plaintiff that aren't of public concern. The
26 plaintiff as a Pakistani was constantly paranoid inside the United States that he was being surveilled.
27 The songs added to the paranoia. It affected his studies. The videos that revealed personal and
28 private facts played a factor that led to his mental illness.

1 59. The plaintiff suffered harm from disclosure by TAYLOR SWIFT PRODUCTIONS, INC. The
 2 culture in Pakistan is different. Where inside the United States the culture is dominant over religion,
 3 in Pakistan the religion is dominant over culture. TAYLOR SWIFT PRODUCTIONS, INC was
 4 producing content when the plaintiff was already in conflict due to his personal choices in the United
 5 States, the defendant added to the conflict.

6 False Light

8 60. This video shows the likeness of Plaintiff hanging out with crossdressers, and BDSM sex
 9 workers. The likeness is also shown with high body count (high number of sexual partners).

10 a. The defendant in her video shows the likeness of the plaintiff giving a speech to a crowd of
 11 BDSM sex workers with an added sign saying "U squad" (the plaintiff's name is Umair).

12 b. Ms. Taylor Swift practices Christianity. Christianity forbids LGBTQ+. In Pakistan, we have
 13 Christian population who do not approve of LGBTQ+. We also have Muslim population who do not
 14 approve of LGBTQ+.

15 c. The defendant showed the plaintiff in a false light. The plaintiff wasn't hanging out with cross
 16 dressers or BDSM sex workers, nor was he racking up body count (Sexual partners) as he was a
 17 married man. The ex-wife of the plaintiff (wife during the release of the video) posted the video song
 18 "Look What You Made Me Do" on her Facebook profile, and then unfriended the plaintiff.
 19

20 Egregious

21 61. The plaintiff family is Barelvi Sunni, Muslim. In Barelvi Islam the Sufism is strong. We listen to
 22 Naa't, the compliments about the Prophet and celebrate his life. In plaintiff's culture, making such
 23 things about someone other than the Prophet, and his close followers is seen as egregious.
 24

25 62. While the plaintiff was an international student, he was not allowed to work. His siblings were
 26 paying an expensive price for his college and board and he used his inheritance money from his late
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 28

1 father. At the same time, the defendant, their associated artists, and their studios were making
2 millions using the likeness of the plaintiff. They got the plaintiff sick from use of his likeness and then
3 they made videos about his sickness. It is egregious to make profit off someone's sickness. The
4 defendant received over 1.5 billion views on the YouTube video of Look What You Made Me Do.

5 6 Damages

- 7
8 63. Emotional distress \$20,000
9 64. Harm to reputation and loss of standing in community \$35,000
10 65. The commercial value of Plaintiff's likeness \$25,000
11 66. Public disclosure of private facts \$25,000
12 67. False light \$25,000
13

14 Prayer For Relief

- 15 68. Stopping such activity in the future to the plaintiff, his relatives, and friends.
16 69. \$130,000 in Damages of Plaintiff
17 70. \$3,525 in Punitive
18 71. Attributable profits (subject to proof at trial)

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20 Demand of trial by jury

21 Respectfully submitted by Muhammad Umair Nabeel
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